April 26, 2006

Adrienne L. Kiley
RegNet Environmental Services
Troy Chemical Company
8 Vreeland Road
P.O. Box 955
Florham Park, NJ 07932

Dear Ms. Kiley:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Butylcarbamic Acid, 3-iodo-2-propynyl Ester, posted on the ChemRTK HPV Challenge Program Web site on February 23, 2005. I commend Troy Chemical Company for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA will post this letter and the enclosed comments on the HPV Challenge Web site within the next few days. As noted in the comments, we ask that Troy Chemical advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Mark Townsend, Chief of the HPV Chemicals Branch, at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: W. Penberthy
J. Willis

EPA Comments on Chemical RTK HPV Challenge Submission:
Butylcarbamic acid, 3-iodo-2-propynyl ester

Summary of EPA Comments

The sponsor, Troy Chemical Company, submitted a test plan and robust summaries to EPA for Butylcarbamic acid, 3-iodo-2-propynyl ester (IPBC; CAS No. 55406-53-6), dated January 11, 2005. EPA posted the submission on the ChemRTK HPV Challenge Web site on February 23, 2005.

EPA has reviewed this submission and has reached the following conclusions:

1. General. The submitter needs to include a test plan in this submission such as a one-page summary table of existing data, data gaps, and what testing is or is not proposed.

2. Physicochemical Properties. The submitted data are adequate for the purposes of the HPV Challenge Program.

3. Environmental Fate. The submitter needs to provide hydrolysis half-life, photodegradation and Level III transport and distribution data.

4. Health Effects. The submitter needs to provide a robust summary of available data for the mouse micronucleus assay to address the chromosomal aberrations endpoint.

5. Ecological Effects. The submitted data are adequate for the purposes of the HPV Challenge Program.

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.

EPA Comments on the Butylcarbamic Acid, 3-iodo-2-propynyl Ester
Challenge Submission

Test Plan

Physicochemical Properties (melting point, boiling point, vapor pressure, partition coefficient and water solubility)

The submitted data are adequate for the purposes of the HPV Challenge Program.

Environmental Fate (photodegradation, stability in water, biodegradation, and fugacity)

The submitted biodegradation data are adequate for the purposes of the HPV Challenge Program. The submitter needs to provide data for the photodegradation, stability in water and fugacity endpoints.

Photodegradation. The presence of an iodoalkyne in this compound suggests that both direct and indirect photolysis may occur. EPA suggests an indirect photolysis screening test following OPPTS 835.5270.

Stability in water. Only qualitative study results were provided. The robust summary needs to include the hydrolysis half-life data cited in the EPA RED document in order for the endpoint to be considered adequately addressed (EPA Reregistration Eligibility Decision, "3-iodo-2-propynyl butyl-carbamate (IPBC)," Office of Prevention, Pesticides and Toxic Substances EPA 738-R-97-003, March 1997).

Health Effects (acute toxicity, repeated-dose toxicity, genetic toxicity, and reproductive/developmental toxicity)

The submitted data are adequate for the purposes of the HPV Challenge Program, except for the chromosomal aberrations endpoint.

Genetic Toxicity (Chromosomal Aberrations). The submitted data for the unscheduled DNA synthesis assay do not address the chromosomal aberrations endpoint. Data from a mouse micronucleus assay are available (information in EPA's Office of Pesticide Programs Reregistration Eligibility Document: http://www.epa.gov/REDs/2725red.pdf) and EPA suggests that the submitter provide a robust summary for this assay to address this endpoint.

Ecological Effects (fish, invertebrates, and algae)

The submitted data are adequate for the purposes of the HPV Challenge Program.

Specific Comments on the Robust Summaries

None.

Followup Activity

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.